

REMARKS

Favorable reconsideration of this application for the reasons noted hereinafter is respectfully requested.

Claims 1-4, 8-15, 19-26, and 30-34 are active in this case.

In the outstanding Office Action, Claims 1, 12, 23, and 34 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee et al. (U.S. Patent No. 7,047,535; hereinafter “Lee”) in view of Davis (U.S. Patent No. 6,674,886) and Coveley et al. (U.S. Patent No. 6,873,620; hereinafter “Coveley”); Claims 2, 3, 13, 14, 24, and 25 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Davis, Coveley, and Lam et al. (U.S. Patent No. 5,926,636; hereinafter “Lam”); Claims 4, 15, and 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Davis, Coveley, and Nakamura et al. (U.S. Patent No. 5,987,529; hereinafter “Nakamura”); and Claims 8-11, 19-22, and 30-33 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Davis, Coveley, and Hamilton et al. (U.S. Patent Publication No. 2003/0177283; hereinafter “Hamilton”).

Initially, Applicants respectfully request that the JP 2002-82806 reference listed in the Information Disclosure Statement filed on November 4, 2003, be acknowledged as having been considered in the next Office Action. Applicants previously requested that this reference be considered in the reply to the Office Action of August 25, 2008.

In response to the rejections under 35 U.S.C. § 103(a), Applicants respectfully request reconsideration of the rejection and traverse the rejection as discussed next.

Independent Claim 1 is directed to an image forming apparatus including:

hardware resources used for image formation, an application for performing processes on image formation, and a platform that exists between the application and the hardware resources, the platform including an operating system and at least one control service to control an execution of each requested process of the hardware resources according to a function call from the application, wherein interprocess

communication is performed between the control service and the application, and the hardware resources include at least a printer and a scanner, the image forming apparatus comprising:

a virtual application service that is provided between the application and the platform, the virtual application service is configured to operate as a client process for the control service and to operate as a server process for the application, and

a wrapping part configured to convert a function called by the application, and perform a function call to the control service by using the converted function, wherein the wrapping part is included in the virtual application service.

Independent Claims 12, 23, and 34 recites substantially similar features as Claim 1.

Thus, the arguments presented below with respect to Claim 1 are also applicable to independent Claims 12, 23, and 34.

Pages 2-3 of the outstanding Office Action assert that column 2, lines 10-15 of Lee describes a “wrapping part for converting a function called by the application, and performing a function call to the control service by using the converted function,” as in Applicants’ Claim 1. Applicants respectfully disagree.

Page 2 of the outstanding Office Action asserts that workflow engine 2 described in Lee is equivalent to Applicants’ claimed “control service.” Column 2, lines 10-16 of Lee describe that “a Java Native Interface (JNI) wrapper is provided to translate the Java APIs to the native code of the workflow engine. The workflow engine then executes the native code to perform the function specified by the API.” In other words, Lee describes that the JNI wrapper translates the Java APIs to the native code which is executed by the workflow engine, but Lee does not describe that the JNI wrapper performs a function call to the workflow engine by using the converted function. Consequently, Lee fails to teach or suggest Applicants’ claimed “wrapping part for converting a function call by the application, and performing a function call to the control service by using the converted function.”

Thus, Applicants respectfully submit that independent Claims 1, 12, 23, and 34 (and all claims depending thereon) patentably distinguish over Lee. Further, Applicants respectfully submit that Lam, Nakamura, Davis, Coveley, and Hamilton fail to cure any of the above-noted deficiencies of Lee.

Accordingly, Applicants respectfully request that the rejections under 35 U.S.C. § 103(a) be withdrawn.

Consequently, in view of the above comments, it is respectfully submitted that the outstanding ground for rejection has been overcome and that Claims 1-4, 8-15, 19-26, and 30-34 patentably define over the prior art. Claims 1-4, 8-15, 19-26, and 30-34 are therefore believed to be in condition for allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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